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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

This Document Relates to Individual Case No.  
3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)  
MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING SCHEDULING**

Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) and Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc. (collectively “Mitsubishi Electric”) have conferred by and through their counsel and, subject to the Court’s approval, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, September 5, 2014 was the deadline to complete fact discovery in the Dell action.

1 WHEREAS, September 12, 2014 is the deadline for all parties to object to or move to  
2 compel additional responses for all written discovery responses in the Dell action.

3 WHEREAS, Dell and Mitsubishi Electric continue to negotiate initial responses and  
4 production of documents by Mitsubishi Electric to Dell's Second Set of Interrogatories and First  
5 Set of Requests for Production.

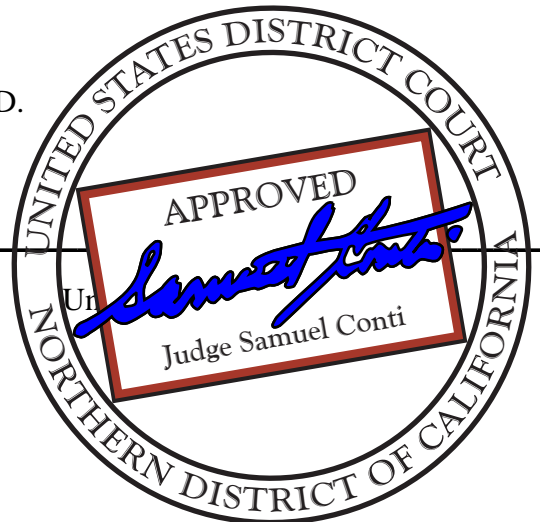
6 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between counsel as  
7 follows: the deadline for Dell to move to compel additional responses for Dell's Second Set of  
8 Interrogatories and First Set of Requests for Production to Mitsubishi Electric shall be moved to  
9 one week following Mitsubishi Electric's initial responses and production. Dell does not waive  
10 any of its rights with respect to Mitsubishi Electric's initial responses to Dell's Second Set of  
11 Interrogatories and First Set of Requests for Production, including challenging the responses as  
12 untimely. If Mitsubishi Electric does not serve its initial responses or reach an agreement with  
13 Dell by September 26, 2014 as to its initial responses, Dell retains the right to move to compel  
14 responses from Mitsubishi Electric with respect to Dell's Second Set of Interrogatories and First  
15 Set of Requests for Production to Mitsubishi Electric. All other dates in the Scheduling Order are  
16 unaffected by this stipulation.

17 \* \* \*

18 The undersigned parties jointly and respectfully request that the Court enter this  
19 stipulation as an order.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21  
22 Dated: October 2, 2014



1 DATED: September 12, 2014

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2 By: /s/ Debra D. Bernstein

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25 *Mitsubishi Electric US, Inc., and Mitsubishi*  
26 *Electric Visual Solutions America, Inc.*

\* \* \*

27 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this  
28 document has been obtained from each of the above signatories.